

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CORY WADE,)	
)	CIVIL ACTION
Plaintiff,)	
v.)	FILE No. 1:14-cv-02206-SCJ
)	
ROWAN CABINET COMPANY,)	
SCOTT ROWAN and)	
CYNTHIA ROWAN,)	
)	
Defendants.)	

**JOINT MOTION FOR REVIEW AND APPROVAL
OF SETTLEMENT AND RELEASE AGREEMENT**

COME NOW Plaintiff Cory Wade and Defendants Scott and Cynthia Rowan (collectively “Movants”) and move this Court for a review and approval of their Settlement Agreement and Full and Final Release of All Claims. As grounds for this Motion, the Movants show the Court as follows:

1.

Plaintiff filed his Complaint on July 11, 2014, alleging violations of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. §201, et seq.

2.

Based upon the understandings and assessments of each party, the Movants, acting at arms-length and in good faith and with the advice of counsel, have—on behalf of Plaintiff and all Defendants—negotiated and entered into a Settlement

Agreement and Full and Final Release of All Claims (“the Settlement Agreement”).

3.

Pursuant to Lynn’s Food Stores, Inc. v. United States of Am., 679 F.2d 1350, 1353 (11th Cir. 1982), judicial approval is required to give effect to Plaintiff’s release of his FLSA claims, which is material to the Settlement Agreement. Accordingly, the Settlement Agreements are attached hereto as Exhibits “A” and “B”

4.

Once the Court approves the Settlement Agreement, and all Payments are made, the Movants will file a Joint Stipulation of Dismissal of this case with prejudice.

5.

For the Court’s convenience, a proposed Order granting this Motion is attached hereto as Exhibit “C.”

WHEREFORE, the Movants respectfully request that this Court review and approve their Settlement Agreement and Full and Final Release of All Claims.

Respectfully submitted this 8th day of October, 2015.

By: /s/Joseph A. White

Joseph A. White

Georgia Bar No. 754315

FRIED & BONDER, LLC

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Attorney for Plaintiff

By: /s/ Scott Rowan

Scott Rowan

Pro Se

90 Jasmine Lane

Oxford, GA 30054

By: /s/ Cynthia Rowan

Cynthia Rowan

Pro Se

90 Jasmine Lane

Oxford, GA 30054

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CERTIFICATE OF COUNSEL

Pursuant to N.D. Ga. R. 7.1, the below signatory attorney certified that this pleading was prepared with times New Roman (14 point), one of the fonts and point selections approved by the Court in local N.D. Ga. R. 5.1 C.

Respectfully submitted this 8th day of October, 2015.

/s/ Joseph A. White
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CERTIFICATE OF SERVICE

I hereby certify that I have, on October 8, 2015, served a true and accurate copy of the foregoing ***JOINT MOTION FOR REVIEW AND APPROVAL OF SETTLEMENT AND RELEASE AGREEMENT*** upon the following by depositing a copy in the United States Mail with proper postage thereon and addressed as follows:

Scott Rowan
90 Jasmine Lane,
Oxford, Georgia 30054

Cynthia Rowan
90 Jasmine Lane,
Oxford, Georgia 30054

Rowan Cabinet Company,
Scott Rowan, Registered Agent
90 Jasmine Lane,
Oxford, Georgia 30054

FRIED & BONDER, LLC

/s/ Joseph. A. White
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